

ATTACHMENT 1
TO
DIRECT TESTIMONY
OF
TORSTEN CLAUSEN

TELECOMMUNICATIONS DIVISION
ILLINOIS COMMERCE COMMISSION

ICC ON ITS OWN MOTION
IMPLEMENTATION OF THE FEDERAL COMMUNICATIONS COMMISSION'S
TRIENNIAL REVIEW ORDER ("TRO") WITH RESPECT TO A BATCH HOT CUT
MIGRATION PROCESS

DOCKET NO. 03-0593

January 30, 2004

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.01**

Request:

Please consider the following two migration scenarios and provide the amount of time it takes SBC Illinois to complete them.

Scenario 1: From line splitting over UNE-P (e.g., AT&T provides the voice service using UNE-P while Covad provides the data service using its own splitter) to SBC voice & data.

Scenario 2: From UNE-P to SBC voice-only.

Response:

SBC Illinois objects to this data request because it refers to an arrangement that does not exist, i.e., “line splitting over UNE-P”. The FCC decisions are clear that SBC is not required to provide UNE-P voice service over a loop that a CLEC uses for line splitting. Put another way, line splitting is an arrangement in which a CLEC purchases an unbundled loop and “splits” it into separate voice and data channels. The CLEC can use unbundled local switching from SBC, but that arrangement is not UNE-P.

Scenario 1: Notwithstanding the incorrect terminology "line splitting over UNE-P", UNE line splitting to line sharing is not a viable migration scenario because the FCC has established that line sharing is only required where the ILEC provides the voice service. The line sharing product carries a three business day interval. The process for an end user to change their service from line splitting back to retail voice and line sharing is one of the scenarios included in the monthly Line Splitting Collaborative.

Scenario 2: Depending on the time of day that the order is placed, the migration takes place on the same day or the next business day.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.02**

Request:

Has SBC Illinois ever performed a line splitting over UNE-P to line splitting over UNE-L migration (no change in either voice or data CLEC)?

Response:

SBC Illinois is not aware of having performed this type of migration. Since SBC Illinois does not inventory UNEs based on whether or not they are part of a line splitting arrangement, SBC Illinois would not necessarily know if such an activity occurred. The various migration scenarios are described on SBC's CLEC online website.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.03**

Request:

If the response to BC TC 1.02 is yes, please detail the performed steps in that migration.

Response:

Not applicable.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.04**

Request:

Has SBC Illinois ever performed a line sharing (SBC provides the voice service while a CLEC provides the data service) to line splitting over UNE-L migration (no change in data CLEC)?

Response:

SBC Illinois is not aware of having performed this type of migration. Since SBC Illinois does not inventory UNEs based on whether or not they are part of a line splitting arrangement, SBC Illinois would not necessarily know if such an activity occurred. The various migration scenarios are described on SBC's CLEC online website.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.05**

Request:

If the response to BC TC 1.04 is yes, please detail the performed steps in that migration.

Response:

Not applicable.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.06**

Request:

Has SBC Illinois ever performed a SBC voice-only to line splitting over UNE-L migration?

Response:

SBC Illinois is not aware of having performed this type of migration. Since SBC Illinois does not inventory UNEs based on whether or not they are part of a line splitting arrangement, SBC Illinois would not necessarily know if such an activity occurred. The various migration scenarios are described on SBC's CLEC online website.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.07**

Request:

If the response to BC TC 1.06 is yes, please detail the performed steps in that migration.

Response:

Not applicable.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.08**

Request:

Has SBC Illinois ever performed a UNE-P to line splitting over UNE-L migration (same voice CLEC before and after the migration)?

Response:

SBC Illinois is not aware of having performed this type of migration. Since SBC Illinois does not inventory UNEs based on whether or not they are part of a line splitting arrangement, SBC Illinois would not necessarily know if such an activity occurred. The various migration scenarios are described on SBC's CLEC online website.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.09**

Request:

If the response to BC TC 1.08 is yes, please detail the performed steps in that migration.

Response:

Not applicable.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.10**

Request:

Assume the following migration scenario is ordered to be included in the enhanced daily process: line sharing to line splitting over UNE-L (no change in data CLEC). What would you consider to be a reasonable completion interval for this migration?

Response:

CLECs have indicated that they do not have (and do not plan to have) the network architecture needed to support this scenario. On information and belief, SBC Illinois understands that: 1) CLECs have not installed the CLEC-to-CLEC cabling needed for the arrangement (for the voice CLEC, this would be the equivalent of installing a tie cable so that they could access loops. The difference would be that instead of connecting to SBC Illinois' frame, they would connect to the data CLEC's frame); and 2) data CLECs have not installed any type of cross connect panel or frame in their collocation arrangement that would allow them to hand off the voice signal.

In addition, SBC has asked CLECs in the 13-state line splitting collaborative if they want SBC to work on CLEC-switched line splitting processes for the currently available product offerings, and each time CLECs have declined this offer (in November 2003, December 2003 and again in January 2004).

Accordingly, SBC Illinois cannot determine an appropriate interval for this hypothetical migration at this time.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.11**

Request:

Assume the following migration scenario is ordered to be included in the enhanced daily process: SBC voice-only to line splitting over UNE-L. What would you consider to be a reasonable completion interval for this migration?

Response:

CLECs have indicated that they do not have (and do not plan to have) the network architecture needed to support this scenario. On information and belief, SBC Illinois understands that: 1) CLECs have not installed the CLEC-to-CLEC cabling needed for the arrangement (for the voice CLEC, this would be the equivalent of installing a tie cable so that they could access loops. The difference would be that instead of connecting to SBC Illinois' frame, they would connect to the data CLEC's frame); and 2) data CLECs have not installed any type of cross connect panel or frame in their collocation arrangement that would allow them to hand off the voice signal.

In addition, SBC has asked CLECs in the 13-state line splitting collaborative if they want SBC to work on CLEC-switched line splitting processes for the currently available product offerings, and each time CLECs have declined this offer (in November 2003, December 2003 and again in January 2004).

Accordingly, SBC Illinois cannot determine an appropriate interval for this hypothetical migration at this time.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.12**

Request:

Assume the following migration scenario is ordered to be included in the defined batch process: UNE-P to line splitting over UNE-L (no change in voice CLEC). What would you consider to be a reasonable completion interval for this migration?

Response:

CLECs have indicated that they do not have (and do not plan to have) the network architecture needed to support this scenario. On information and belief, SBC Illinois understands that: 1) CLECs have not installed the CLEC-to-CLEC cabling needed for the arrangement (for the voice CLEC, this would be the equivalent of installing a tie cable so that they could access loops. The difference would be that instead of connecting to SBC Illinois' frame, they would connect to the data CLEC's frame); and 2) data CLECs have not installed any type of cross connect panel or frame in their collocation arrangement that would allow them to hand off the voice signal.

In addition, SBC has asked CLECs in the 13-state line splitting collaborative if they want SBC to work on CLEC-switched line splitting processes for the currently available product offerings, and each time CLECs have declined this offer (in November 2003, December 2003 and again in January 2004).

Accordingly, SBC Illinois cannot determine an appropriate interval for this hypothetical migration at this time.

**Illinois Commerce Commission
Docket 03-0593
Staff Data Request BC TC 1.13**

Request:

Assume the following migration scenario is ordered to be included in the defined batch process: line splitting over UNE-P to line splitting over UNE-L (no change in either voice or data CLEC). What would you consider to be a reasonable completion interval for this migration?

Response:

CLECs have indicated that they do not have (and do not plan to have) the network architecture needed to support this scenario. On information and belief, SBC Illinois understands that: 1) CLECs have not installed the CLEC-to-CLEC cabling needed for the arrangement (for the voice CLEC, this would be the equivalent of installing a tie cable so that they could access loops. The difference would be that instead of connecting to SBC Illinois' frame, they would connect to the data CLEC's frame); and 2) data CLECs have not installed any type of cross connect panel or frame in their collocation arrangement that would allow them to hand off the voice signal.

In addition, SBC has asked CLECs in the 13-state line splitting collaborative if they want SBC to work on CLEC-switched line splitting processes for the currently available product offerings, and each time CLECs have declined this offer (in November 2003, December 2003 and again in January 2004).

Accordingly, SBC Illinois cannot determine an appropriate interval for this hypothetical migration at this time.